

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**In re: Elisa Jaime Lowe  
xxx-xx-5474  
Debtor**

**Case No. 13-53803  
Judge C. Kathryn Preston  
Chapter 7**

**MOTION TO REOPEN CHAPTER 7 CASE**

Now comes the Debtor, Elisa Jaime Lowe by her attorney and respectfully moves this Court for an Order Reopening their Chapter 7 case pursuant to 11 U.S.C. § 350(b) to permit the Debtor to file an Adversary Proceeding to enforce the Debtor's discharge. The basis for this motion is more fully stated in the Memorandum in Support set forth below.

**MEMORANDUM IN SUPPORT**

1. Debtor petitioned this court under Chapter 7 of the Bankruptcy Code, on May 10, 2013. Debtor received a discharge on October 29, 2013 and the case was subsequently closed.
2. Debtor desires to file an Adversary Proceeding for violation of the discharge injunction and related claims.
3. Undersigned counsel hereby certifies that the purpose of the reopening of this case relates to Debtor's discharge. Therefore no filing fee is required LBR 5010-1.

WHEREFORE, Debtor requests an Order that the Motion be GRANTED and that Debtor be permitted to reopen their chapter 7 case so that they may bring an Adversary Proceeding against a creditor for violation of the discharge injunction and related claims and for such other relief as is just and proper.

/s/ Robert Ellis

Robert Ellis, Esq. (0011706)  
ELLIS & ELLIS,  
A Legal Professional Association  
Attorneys for Debtor  
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Marietta, OH 45750  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the attached Motion to Reopen Case was served this date on the parties whose names and full addresses are listed below, by United States Mail postage prepaid and/or electronically, as and for NOTICE that the attached request for relief has been filed.

**DATED:** 12/16/2014

/s/ Robert Ellis

Robert Ellis, Esq.

**The following were served by U.S. mail:**

Elisa Jaime Lowe  
59 N. Seventh Street  
McConnelsville, Ohio 43756

All creditors and parties in interest as shown on the attached matrix

**The following were served electronically through the court's ECF System at the email address registered with the court:**

Brent A. Stubbins, Chapter 7 Trustee  
Office of the U. S. Trustee

Label Matrix for local noticing  
0648-2  
Case 2:13-bk-53803  
Southern District of Ohio  
Columbus  
Tue Dec 16 11:50:13 EST 2014

American Infosource LP as agent for  
Midland Funding LLC  
PO Box 268941  
Oklahoma City OK 731268941

Asst US Trustee (Col)  
Office of the US Trustee  
170 North High Street  
Suite 200  
Columbus, OH 43215-2417

Victor O Buente Jr  
100 North Center St  
Newton Falls, OH 44444-1321

CIRAS LLC  
Attn Kevin Harper  
3000 Smoot Road  
Suite A  
Smoot, WV 24977-9602

Ciras ,LLC  
3000 Smoot Rd Ste A  
Smoot, WV 24977-9602

Robert Ellis  
328 4th St  
Marietta, OH 45750-2001

Brian M Gianangeli  
6305 Emerald Parkway  
Dublin, OH 43016-3241

HSBC  
Attn: Dispute Process  
12447 SW 69th Ave  
Portland, OR 97223-8517

Internal Revenue Service  
Insolvencies  
PO Box 7346  
Philadelphia, PA 19101-7346

John Lowe  
59 N 7th St  
McConnelsville, OH 43756-1101

Elisa Jaime Lowe  
59 N 7th St  
McConnelsville, OH 43756-1101

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1100 Superior Ave E 19th Fl  
Cleveland, OH 44114-2521

Mark Howdysshell, Pros  
19 E Main St  
McConnelsville, OH 43756-1100

Midland Funding LLC  
8875 Aero Dr Ste 200  
San Diego, CA 92123-2255

Morgan County Treasurer  
Dawn M Hosom  
155 E Main St Rm 153  
McConnelsville, OH 43756-1297

Morgan County Treasurer  
Mark J. Howdysshell,  
Prosecuting Attorney  
19 E. Main St.  
McConnelsville, OH 43756-1172

Thomas Musarra  
4367 State Road  
Akron, OH 44319-3497

(p)OHIO BUREAU OF WORKERS COMPENSATION  
LAW SECTION BANKRUPTCY UNIT  
P O BOX 15567  
COLUMBUS OH 43215-0567

Ohio Department Of Job & Family Services  
Revenue Recovery - Litigation  
PO Box 182404  
Columbus, OH 43218-2404

Ohio Department Of Taxation  
Attn: Bankruptcy Division  
PO Box 530  
Columbus, OH 43216-0530

Ohio Department Of Taxation  
C/O Attorney General Of Ohio  
150 E Gay St Fl 21  
Columbus, OH 43215-3191

Peter N Cultice, Esq  
58 N 5th St  
Zanesville, OH 43701-3527

Brent A Stubbins  
59 N 4th St  
Zanesville, OH 43701-3409

Brent A Stubbins  
PO Box 488  
Zanesville, OH 43702-0488

The Cadle Company  
100 North Center Street  
Newton Falls, OH 44444-1380

The Cadle Company  
100 N. Center St.  
Attn: HHA50001  
Newton Falls, OH 44444-1380

Thomas M Musarra, Esq  
4367 State Rd  
Akron, OH 44319-3497

US Department Of Education  
Direct Loan Servicing Center  
PO Box 5602  
Greenville, TX 75403-5602

Union Plus Credit Card  
PO Box 80027  
Salinas, CA 93912-0027

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Ohio Bureau of Workers' Compensation  
PO Box 15567  
Columbus, OH 43215-0567

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Bureau of Workers' Compensation	(d)Ciras, LLC	End of Label Matrix	
	3000 Smoot Rd Ste A	Mailable recipients	29
	Smoot, WV 24977-9602	Bypassed recipients	2
		Total	31